

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Robert Holt, et al. v. National Football  
League, et al. (Plaintiff Rickey Dixon and  
Lorraine Dixon ONLY)

Court File No. 12-cv-4185-AB

**RESPONSE IN SUPPORT OF**  
**ZIMMERMAN REED'S PETITION**  
**TO ESTABLISH ATTORNEY'S LIEN**

Zimmerman Reed LLP respectfully disagrees with Rickey and Lorraine Dixons' assertions regarding the firm's representation of them in this litigation. These assertions are inaccurate and omit the significant work and litigation risk undertaken by Zimmerman Reed on their behalf, as well as the significant work done by other MDL counsel on behalf of their individual clients. Zimmerman Reed will respond fully at the appropriate time through the lien resolution process established by the Court.

Dated: March 31, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing Response in Support of Zimmerman Reed's Petition to Establish Attorney's Lien to be served via the Electronic Case Filing (ECF) system in the United States District Court for the Eastern District of Pennsylvania, on all parties registered for CM/ECF in the litigation.

Dated: March 31, 2017

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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